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RYADH - IN AFFILIATION WITH
THE LAW OFFICE OF ABDULAZIZ H. FAHAD

June 30, 2000

VIA MESSENGER

David H. Morgenstern, Esq.
Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 5028

Dear Mr. Morgenstern:

This letter responds to the Commission's notice of June 15, 2000 (received on June 19th), informing the Arab American Leadership Political Action Committee ("ALPAC") that the Commission had found "reason to believe" ALPAC violated the Federal Election Campaign Act's reporting requirements by failing to timely file two 1998 reports. More specifically, the "Factual and Legal Analysis" states that ALPAC failed to timely file its 1998 July Quarterly and Year-End Reports.

At the outset, it is important to note that the aforementioned reports were filed by ALPAC, albeit late, seven (7) months prior to the Commission's initiation of this proceeding. ALPAC worked closely with the Commission's Reports Analysis Division last November to remedy the situation and to ensure generally that all of its 1998 reports were filed and complete. Thus, well in advance of the Commission's determination, ALPAC already had cured its reporting deficiencies to the satisfaction of the Reports Analysis Division.

ALPAC's failure to timely file its 1998 July Quarterly and Year-End reports was largely attributable to staff turnover and a number of administrative errors. In particular, when the individual responsible to the Treasurer for preparing and filing ALPAC's reports departed in mid-1998, her successor mistakenly believed the second quarter report (due July 15th) had been filed. ALPAC's 1998 October Quarterly, Pre-General Election and Post-General Election reports were all subsequently timely filed.

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David H. Morgenstern, Esq.
June 30, 2000
Page 2

A similar administrative error resulted in ALPAC's failure to file its 1998 Year-End Report. In that case, a 1998 Year-End Report was prepared and signed by the Treasurer on January 15, 1999, but for some inexplicable reason the report was never delivered to the Commission. This explains, however, why ALPAC filed an "amended" 1998 Year-End Report on February 8, 1999, when there was no public record at the time of an original Year-End Report having been filed.

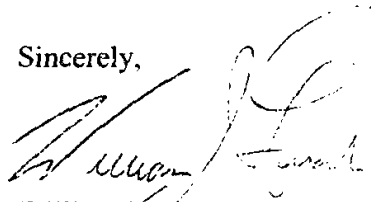
We understand the Commission routinely sends a "Notice of Failure to File" to non-filers, and the Commission's website, which provides a list of all documents and correspondence filed in connection with each Federal political committee, makes reference to such notices being sent to ALPAC with regard to its 1998 July and Year-End Reports. However, ALPAC has found no record of receiving any of the notices. This could be attributable to the staff turnover previously referred to and/or to office renovations that were underway in 1998 that may have interfered with the orderly processing and routing of the mail.

In any event, ALPAC admits to failing to timely file the two aforementioned reports and hereby accepts the Commission's invitation to pursue pre-probable cause conciliation.

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.
David H. Morgenstern, Esq.
June 30, 2000
Page 3

I look forward to hearing from you at your earliest convenience.

Sincerely,



William J. Farah

cc: George R. Salem, P.C.